

BellSouth Telecommunications, Inc.
Suite 2101
333 Commerce Street
Nashville, Tennessee 37201-3300

615 214-6301
Fax 615 214-7406

July 16, 1999

'99 JUL 16 PM 4 09
Guy M. Hicks
General Counsel

OFFICE OF THE
EXECUTIVE SECRETARY

VIA HAND DELIVERY

David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. in Tennessee*
Docket No. 98-00559

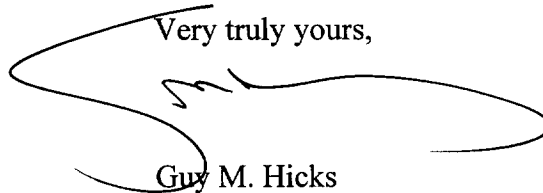
Dear Mr. Waddell:

Enclosed are the original and thirteen copies of non-proprietary portions of BellSouth Telecommunications, Inc.'s responses to the following discovery requests:

Consumer Advocate Division Interrogatories
Consumer Advocate Division Request for Admissions
Consumer Advocate Division Request for Production of Documents
Time Warner/New South Data Requests
Nextlink/SECCA Data Requests.

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,



Guy M. Hicks

GMH:ch
Enclosure

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 2
Page 1 of 1

REQUEST: Provide all information in the possession of BellSouth relating to offers made by local exchange carriers to provide service to the customers who are parties to the above-captioned contracts.

RESPONSE: See attachments to Item No. 1

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 3
Page 1 of 1

REQUEST: Please describe the "Key Customer Program," or any BellSouth program which may be called by that name or by a similar name (hereafter referred to as the "Key Customer" program"). Provide copies of all documents describing this program.

RESPONSE: BellSouth objects to this Data Request on grounds that it is vague and ambiguous. Moreover, the information requested is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to this objection and without waiving this objection, the "Key Customer Program" is designed for small business customers, and neither the customer that is a party to CSA KY98-4958-00 nor the customer that is a party to CSA TN98-2766-00 would qualify to participate.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 4
Page 1 of 1

REQUEST: Please describe all other marketing programs (other than tariffed promotions) in effect during 1999 which allow a customer to obtain service at less than the tariffed rate. If so, please identify the applicable program or promotion.

RESPONSE: None.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 5
Page 1 of 1

REQUEST: Is either of the two, above-captioned contracts part of the Key Customer program or any other program or promotion described in Questions 3 and/or 4? If so, please identify the applicable program or promotion.

RESPONSE: No.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 1
Page 1 of 1

REQUEST: Please provide copies of all BellSouth documents which refer to the two
above-captioned contracts.

RESPONSE: See attached.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 2
Page 1 of 1

REQUEST: Provide all information in the possession of BellSouth relating to offers made by local exchange carriers to provide service to the customers who are parties to the above-captioned contracts.

RESPONSE: See attachments to Item No. 1

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
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Date Filed: July 9, 1999
Item No. 3
Page 1 of 1

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RESPONSE: BellSouth objects to this Data Request on grounds that it is vague and ambiguous. Moreover, the information requested is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to this objection and without waiving this objection, the "Key Customer Program" is designed for small business customers, and neither the customer that is a party to CSA KY98-4958-00 nor the customer that is a party to CSA TN98-2766-00 would qualify to participate.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 4
Page 1 of 1

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RESPONSE: None.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
SECCA and NEXTLINK's First Data
Requests
Date Filed: July 9, 1999
Item No. 5
Page 1 of 1

REQUEST: Is either of the two, above-captioned contracts part of the Key Customer program or any other program or promotion described in Questions 3 and/or 4? If so, please identify the applicable program or promotion.

RESPONSE: No.

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

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☐ Overnight

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

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Henry Walker, Esquire
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BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
Time Warner and NewSouth's First Data
Requests
File Date: July 9, 1999
Item No. 1
Page 1 of 2

REQUEST: Please provide a detailed explanation of how BellSouth, through its account teams or otherwise, qualified the products and/or services described in Contract Service Arrangement TN98-6766-00, TRA Docket No. 98-00210, and Contract Service Arrangement KY98-49588-00, TRA Docket No. 98-00244 ("CSAs") to be rendered under a Contract Service Arrangement. The explanation should include whether the customers notified BellSouth of a pending offer from a competitor, the identify of the competitor, the terms of the competitor's offer, and the date on which the competitor made a formal offer. If the CSAs were not provided in response to a competitive offer, please describe the circumstances under which the customers entered into the CSAs.

RESPONSE: These two CSAs involve existing BellSouth customers which are supported by BellSouth account teams. Discussions between BellSouth and the customer regarding the provision of a CSA come about as a result of the ongoing account management process. Although BellSouth provides the majority of its products and services to customers at tariffed rates, account teams are charged with establishing and maintaining a positive ongoing relationship, which may include offering the customer a CSA in order to retain existing revenues for BellSouth and to sell the customer new products and services that will result in additional revenue to BellSouth. Customers also will at times indicate to BellSouth that they have received a competitive offer at lower prices or with terms and conditions which differ from those in BellSouth's tariffs. Customers typically do not provide the BellSouth account team with copies of competitors' offers. BellSouth's response to such a competitive proposal may be to offer the customer a CSA. BellSouth also offers CSAs in support of responses to competitive bids which are issued directly by the customer or through a consultant.

The customer that is a party to CSA KY98-4958-00 notified the BellSouth Account Team that it had received proposals from AT&T, ACSI and Ameritech. According to the customer, the savings quoted range from 15% to 40% off of BellSouth tariff rates. The customer is using Nextlink in Columbus, Ohio and is satisfied with its service.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
Time Warner and NewSouth's First Data
Requests
File Date: July 9, 1999
Item No. 1
Page 2 of 2

The customer that is a party of CSA TN98-6766-00 notified the BellSouth Account Team that it had been contacted by Nextlink, MCI and AT&T. No details regarding their offers were shared with the BellSouth Account Team. The customer expressed a strong desire for discounts off of BellSouth standard tariffed rates.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
Time Warner and NewSouth's First Data
Requests
File Date: July 9, 1999
Item No. 2
Page 1 of 1

REQUEST: For each of the services included in the CSAs identified in Request No. 1, please provide the customers' usage patterns and billed revenue for the two years prior to entering into the CSAs with BellSouth.

RESPONSE: BellSouth objects to this request as being vague and ambiguous to the extent it seeks information regarding the undefined term "usage patterns."

This customer's annualized billed revenue in Tennessee that was used in developing CSA KY98-4958-00 is \$894,060.00. The annualized billed revenue in Tennessee that was used in developing CSA TN98-6766-00 is \$3,876,336.00.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
Time Warner and NewSouth's First Data
Requests
File Date: July 9, 1999
Item No. 3
Page 1 of 1

REQUEST: For each of the services included in the CSAs identified in Request No. 1, please provide the customers' usage patterns and billed revenue subsequent to entering into the CSAs with BellSouth.

RESPONSE: BellSouth objects to this request as being vague and ambiguous to the extent it seeks information regarding the undefined term "usage patterns."

BellSouth has not implemented the discounts provided in these CSAs since they have not been approved by the Tennessee Regulatory Authority. The annualized revenue amount for TN98-2766-00 (Docket 99-00210), comparable to the response in Item No. 2, is \$3,408,000. The comparable annualized revenue for KY98-4958-00 (Docket 99-00244) is \$792,000.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
Time Warner and NewSouth's First Data
Requests
File Date: July 9, 1999
Item No. 6
Page 1 of 1

REQUEST: Please describe the process that BellSouth undertakes to calculate the termination charges assessed a customer receiving services under a CSA in the event the customer elects to terminate the contract prior to the stated contract period.

RESPONSE: Calculations of any termination charges would be made in accordance with the terms of Section IX, Termination Liability, of the CSA in Docket 99-00210 (CSA TN98-2766-00). These calculations would be made in accordance with the revised Section IX, Termination Liability, contained in the Amendment to Volume and Term Agreement in Docket 99-00244 (CSA KY98-4958-00).

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
Time Warner and NewSouth's First Data
Requests
File Date: July 9, 1999
Item No. 7
Page 1 of 1

REQUEST: Please indicate the percentage of CSAs in effect in Tennessee that BellSouth has assessed early termination charges during the past five years.

RESPONSE: None of BellSouth's CSAs in Tennessee have been terminated so as to trigger the termination provisions in the respective CSAs. Some CSAs have expired or been upgraded, which did not result in the payment of termination liability.

CERTIFICATE OF SERVICE

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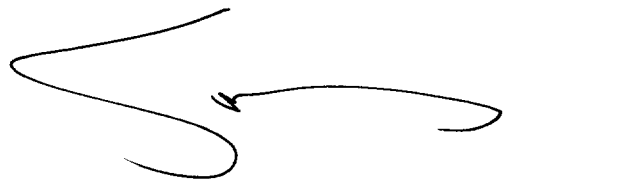
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230 4th Ave., N., 3rd Fl.
P. O. Box 198888
Nashville, TN 37219-8888



A handwritten signature in black ink, consisting of a large, stylized 'S' shape followed by a horizontal line and a small loop.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Production of Documents
File Date: July 9, 1999
Item No. 1
Page 1 of 1

REQUEST: Produce for inspection and copying a copy of any and all analyses that show that the difference in the cost of providing service to the customer served under each CSA and the cost of providing service to the class of customers provided the same service under tariff is equal to or greater than discount provided under the CSA.

RESPONSE: BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Production of Documents
File Date: July 9, 1999
Item No. 2
Page 1 of 1

REQUEST: For **each** CSA produce for inspection and copying a copy of all studies, analysis, reports, correspondence, etc. prepared by or on behalf of BellSouth to determine that all similarly situated Tennessee customers have been made aware of or other wise offered a comparable CSA.

RESPONSE: BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Production of Documents
File Date: July 9, 1999
Item No. 3
Page 1 of 1

REQUEST: For each CSA produce for inspection and copying a copy of all correspondence, notices, advertisements, etc. from which customers who are or may be similarly situated to the customer being served under the CSA could reasonable be expected to learn of the rates, terms, and conditions of the CSA.

RESPONSE: BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Production of Documents
File Date: July 9, 1999
Item No. 4
Page 1 of 1

REQUEST: Produce for inspection and copying a copy of all BellSouth directives, memorandums, operating procedures, scripts used by sales representatives, marketing procedures, internal correspondence, etc. that address the offering of CSAs to BellSouth customers.

RESPONSE: BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Production of Documents
File Date: July 9, 1999
Item No. 5
Page 1 of 1

REQUEST: Please produce for inspection and copying any and all correspondence (letters, memoranda, e-mail, meeting notes, etc.) that address offers made to the customers served under these CSAs by competing, or potentially competing, local exchange companies (this includes offers made before or after the customer entered into the CSA),

RESPONSE: BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

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BellSouth Telecommunications, Inc.,
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Admit or Deny
File Date: July 9, 1999
Item No. 1
Page 1 of 1

REQUEST: For **each** CSA:

- A. Admit or deny that BellSouth can show that the difference in the cost of providing service to the customer served under **each** CSA and the class of customers provided the same service under tariff is equal to or greater than discount provided under the CSA.
- B. If admitted, provide supporting documents for **each** CSA.

RESPONSE: See BellSouth's response to Item No. 2A and 2B, CAD's First Request for Admission, Docket 98-00559, September 16, 1998.

REQUEST: In response to the Consumer Advocate's September 30, 1997 Information Request Item 14, in Docket No. 97-01105 BellSouth stated that:

BellSouth is prepared to enter in a CSA with any similarly situated customer who meets the basic criteria outlined in response to Request No. 4.

The response to Request No. 4 states:

The characteristics that set the CSA customer apart from other customers who are purchasing similar services but who have not contracted for a "CSA" vary. However, these accounts are distinguished by three basic criteria: (1) BellSouth has reason to believe that the price of service under its existing tariff offering is not competitive for that particular customer; (2) the customer has a competitive alternative available; and (3) the customer is willing to sign a CSA with BellSouth and commit to the terms and conditions contained in the CSA.

- A. Admit or deny that the criteria used by BellSouth in determining that the customers served under the CSA at issue were:
 - (1) BellSouth has reason to believe that the price of service under its existing tariff offering is not competitive for that particular customer
 - (2) the customer has a competitive alternative available; and
 - (3) the customer is willing to sign a CSA with BellSouth and commit to the terms and conditions contained in the CSA?
- B. If BellSouth denies the Request to Admit or Deny in item 3A, please explain each and every such additional criteria which BellSouth used to determine these customer location locations were subject to service under a CSA.

BellSouth Telecommunications, Inc.,
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Admit or Deny
File Date: July 9, 1999
Item No. 2
Page 2 of 2

- C. Admit or Deny that BellSouth has no other specific criteria for offering CSAs other than the criteria stated in the Request to Admit or Deny in item 3A.

RESPONSE: See BellSouth's response to Item No. 3, CAD's First Requests for Admission, Docket 98-00559, September 16, 1998

- REQUEST:
- A. For **each** CSA and **each** service provided under the CSAs admit or deny that the service is available at BellSouth's tariffed rates in BellSouth's tariffs approved by the TRA under which BellSouth provides service to other ratepayers.
 - B. For **each** Contract Service Arrangement (CSA) and **each** service provided under the CSAs admit or deny that the service is available under terms and conditions covered by BellSouth's tariffs approved by the TRA under which BellSouth provides service to other ratepayers.
 - C. For **each** CSA and **each** practice covered by the CSAs, admit or deny that each practice provided in the CSA is provided in BellSouth's tariffs approved by the TRA under which BellSouth provides service to other ratepayers.
- RESPONSE:
- A. Admit with the following clarification. No services are provided or provisioned under the CSA. The services are provisioned under the tariffs for these services. The CSA provides discounts which apply to the services in the aggregate.
 - B. BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.
 - C. BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Admit or Deny
File Date: July 9, 1999
Item No. 4
Page 1 of 1

REQUEST: Please admit or deny for each CSA that the termination charge provided in the CSA is not based on cost.

RESPONSE: BellSouth objects to this request as being overly broad and unduly burdensome in that the Hearing Officer expressly limited discovery by each party to thirty (30) discovery requests, including subparts; this request by the CAD exceeds that limitation.

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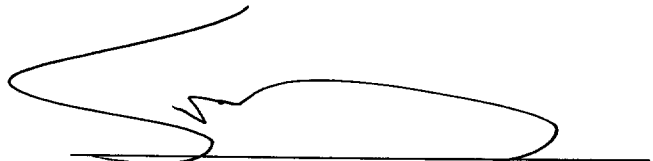
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BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
CAD's First Interrogatories
File Date: July 9, 1999
Item No. 1
Page 1 of 1

REQUEST: For **each** of the two Contract Service Arrangements ("CSAs") at issue in these dockets ("CSAs at issue" or "CSAs") that BellSouth has filed with the Tennessee Regulatory Authority ("TRA"), identify all of the **specific characteristics** of the customer served under the CSA that BellSouth believes sets that customer apart from and results in that customer not being similarly situated to the class of customers who are purchasing the same service(s) from BellSouth under tariffs approved by the TRA.

RESPONSE: See BellSouth's response to Item No. 1, CAD's First Interrogatories in Docket 98-00559, September 16, 1998.

REQUEST: In response to the Consumer Advocate's September 30, 1977 Information Request Item 4, in Docket No. 97-01105 BellSouth stated that:

The characteristics that set the CSA customer apart from other customers who are purchasing similar services but who have not contracted for a "CSA" vary. However, these accounts are distinguished by three basic criteria: (1) BellSouth has reason to believe that the price of service under its existing tariff offering is not competitive for that particular customer; (2) **the customer has a competitive alternative available**; and (3) the customer is willing to sign a CSA with BellSouth and commit to the terms and conditions contained in the CSA. (Emphasis added.)

- A. For **each** CSA at issue, identify by name the specific competitor(s) who, **at the time the CSA was negotiated**, had or who BellSouth had reason to believe had facilities in place and was (were) capable of providing **each** location provided service under the CSA with the same service(s) or service(s) that could be substituted for **each** service provided under the CSA.
- B. Produce for inspection and copying all analysis made by BellSouth to determine the competitive carrier who could provide the competitive service. Identify, by name and title, all the persons who made each such analysis.
- C. Produce for inspection and copying, all information provided by the customer to show that the customer had a competitive alternative carrier.

RESPONSE: A. See BellSouth's response to Item No. 2, CAD's First Interrogatories in Docket 98-00559, September 16, 1998.

B. See BellSouth's response to Item No. 2, CAD's First Interrogatories in Docket 98-00559, September 16, 1998.

RESPONSE (continued):

A copy of an updated version of the Tennessee Competing Telecommunications Service Provider Summary Information Report, which is prepared from CLEC filings by Jerry G. Jones, Manager-Regulatory Affairs, is attached. Because of difficulties in obtaining the necessary information, BellSouth has not updated the last column in this report entitled "Status" since 1997.

- C. The customer in Docket 99-00244 (CSA KY98-4958-00) verbally notified the BellSouth Account Team that it had received proposals from AT&T, ACSI and Ameritech. According to the customer, the savings quoted range from 15% to 40% off of BellSouth tariff rates. The customer is using Nextlink in Columbus, Ohio and is satisfied with their service.

The customer in Docket 99-00210 (CSA TN98-2766-00) notified the BellSouth Account Team that it had been contacted by Nextlink, MCI and AT&T. No details regarding their offers were shared with the BellSouth Account Team. This customer also expressed a strong desire for discounts off of BellSouth standard tariff rates.

Documents responsive to this request are proprietary and are being provided under separate cover subject to the terms of the Protective Order entered in this proceeding.

TENNESSEE COMPETING TELECOMMUNICATION SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATIONS	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION		INTERCONNECT AGREEMENT			STATUS	
							FILED	APPROVED	NEGOTIATION START	COMPLETION	TRA APPROVED		APPROVED
1 Access Network Services, Inc.	Shared Technologies Farcchild Communications Corp.	Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	97-01293	06/30/97	Withdrawn					Operating as a Reseller of Residence Local Service
2 ACI Corp.		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	99-00122	02/19/99	04/27/99					
4 ALEC, Inc.		Filed as a Fully Certified CTSP	Statewide	Nashville Memphis	Full Range of Services	98-00599	08/31/98	04/13/99	02/04/97	05/01/97			
5 ALLTEL Communications, Inc.	ALLTEL	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	99-00149	04/02/99	05/18/99					
6 AT&T Communications of South Central States, Inc.	AT&T Corporate	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	95-02790 96-01152 97-00249	07/24/95	10/13/95	03/04/96	02/22/97	02/24/98	03/25/97	Facility-based and Reseller Limited Local Service Tariff
7 ATS of Tennessee, LLC	ATS Telephone & Data Systems, Inc.	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	95-02763	07/14/95	09/07/95	03/08/96				Facility-based
8 AVR of Tennessee, LP dba Hyperion of TN, LP	Subsidiary of Adphia Cable Communications Corp. General Partner: Viacom Telecom, Inc., owned by Viacom, Inc. Limited Partner: John Media, owned by Intermedia Partners	Fully Certified as a CTSP	Statewide	Nashville Counties of Davidson, Cheatham, Maury, Robertson, Rutherford, Williamson	Full Range of Services	94-00661 97-00983	03/03/94	08/24/95	11/05/96	04/9/97	05/01/97	07/15/97	Facility-based Begin offering service June 1997
9 BellSouth BSE	BellSouth	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services Limited to Non BST area	95-07505	10/30/97	09/15/98					
10 Ben Lomand Communications	Ben Lomand RTC	Fully Certified as a CTSP	Warren and White Counties	McKinnisville Sparta	Full Range of Services	98-00600	08/01/98	02/16/99					
11 BlueStar Communications		Fully Certified as a CTSP	Statewide	Nashville	DSL Internet Access and Phone Service	98-00569 99-00339	08/07/98	09/22/98			05/07/99	06/08/99	
12 Brooks Fiber Communications of Tennessee	Brooks Fiber Properties, Inc. Merged with WorlCom	Fully Certified as a CTSP	Statewide	Knoxville	Full Range of Services	95-02764 96-01484	07/14/95	09/07/95	02/28/96	09/11/96	10/10/96	12/03/96	Facility-based Begin offering service 2nd quarter 1997
13 Business Telecom, Inc. (BTI)		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	98-00126 98-00319 98-00334 98-00211	N/A	03/10/98 07/07/98	02/29/97	06/23/97	05/05/98	05/19/98	

TENNESSEE COMPETING TELECOMMUNICATION SERVICE PROVIDER SUMMARY INFORMATION												
COMPANY	CORPORATE AFFILIATION	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION		INTERCONNECT AGREEMENT			STATUS
							FILED	APPROVED	NEGOTIATION START	COMPLETE	FILED	APPROVED
14 Citizens Telecommunications Company	Sister Companies: Citizens Telecom of TN, Citizens Telecom of Volunteer State	Fully Certified as a CTSP	Greater Nashville, Memphis, Chattanooga, and Knoxville areas	Knoxville	Full Range of Services	96-00779 97-00984	04/15/96	06/27/96	06/4/96	03/10/97	05/01/97	05/13/97 Filed for Full Certification. Approved as Reseller Only at this time
15 Comm. Depot, Inc.	Rad Mountain Communication	Fully Certified as a CTSP	Statewide	Resale statewide, facility based in Memphis and Nashville	Resale of BST Services	96-00922 97-00186	05/16/96	06/28/96	09/12/96	01/29/97	02/07/97	03/18/97
16 Dakota Services Limited		Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	98-00779	11/05/98	Pending				
17 Delta Comm. Inc.	ITC Holding Company	Fully Certified as a CTSP	Statewide	Chattanooga Nashville Memphis Knoxville	Full Range of Services	96-01431 97-00419	10/31/96	01/02/97	12/13/96	03/14/97	04/02/97	05/20/97
18 Digital Teleport, Inc. (DTI)	DTI Holding Company	Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	98-00643	09/22/98	12/08/98				
19 DSLnet Communications, LLC		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	99-00092	02/12/99	05/18/99				
20 Eastern Telecom Services		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	97-01004	05/06/97	07/01/97				
21 Electric Power Board of Chattanooga		Fully Certified as a CTSP	Hamilton County	Chattanooga	Full Range of Services	97-07488 99-00409	10/16/97	02/09/99			08/10/99	
22 e.spire	Formerly American Communication Services of Chattanooga, and of Knoxville, INC. (ACSI)	Fully Certified as a CTSP	Chattanooga Knoxville	Chattanooga Knoxville	Resale of BST Services	95-02895 96-01316 97-00360	08/11/95	10/11/95	03/06/96	07/25/96	08/29/96 03/20/97	12/17/96 04/15/97 Facility-based Begin offering service 04/97
23 Frontier Local Service Inc. (FLSI)	Merged with Global Crossing Ltd.	Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	99-00120	02/09/99	Pending				
24 Global NAPs Gulf, Inc.		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	99-00183	03/15/99	05/18/99				
25 GTE Card Services, Inc.	GTE Long Distance GTELD, GTE Co. 2.	Fully certified as a CTSP	Statewide	Statewide	Full Range of Services	97-00103 97-01408	01/21/97	04/08/97	NA	01/21/97	08/19/97	10/07/97
26 Helican Telephone Tennessee, LLC		Filed as a Fully Certified CTSP	Statewide	Chattanooga Area	Full Range of Services	98-00813	11/17/98	Withdrawn				

TENNESSEE COMPETING TELECOMMUNICATION SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATION:	TYPE OF COMPETITION	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION			INTERCONNECT AGREEMENT			STATUS
							FILED	APPROVED	NEGOTIATION START	COMPLETE	FILED	APPROVED	
27 ICG Telecom Group, Inc.	ICG USA, Inc.	Fully Certified as a CTSP	Intrastate, interLATA, non-dominant carrier	Nashville	Full Range of Services	95-01030 97-00935 98-00249	01/26/95	08/24/95	02/03/96	02/05/97	04/19/97 08/10/98	05/20/97 09/15/98	Facility-based Begin offering service 2nd quarter 1997
28 Internedia Communications, Inc.	IN Registered Agent: The Penitence Hall Corp. Systems, Inc.	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	96-00942 96-01161	04/26/96	09/17/96	02/08/96	06/21/96	07/17/96	12/03/96	Switch being installed with service expected 1st half 1998
29 Interpath Communications	Carolina Power & Light Company	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	98-00651	12/02/98	02/09/99					
30 KMAC Telecom III, Inc.		Filed as a Fully Certified CTSP	Statewide	Knoxville	Full Range of Services	89-00211	04/01/89	Pending					
31 LCI International Telecom, Corp. d/b/a Qwest Communications Services	Merged with Qwest	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	86-00783 97-00361	04/19/96	05/30/96	04/04/96	02/08/97	03/20/97	04/15/97	Resale Agreement Only Begin offering service 8/97
32 Level 3 Communications LLC (Level 3)	PKS Information Services, Inc. & Level 3 Communications Inc.	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	96-00610	09/04/98	11/03/98	01/22/98	03/12/98			
33 LoadPort Telecommunications, LLC	ISDN-Net, Inc.	Fully Certified as a CTSP	Statewide	Statewide	High Speed Data Services	96-00669	12/11/98	02/09/99					
34 LOGIX Communications		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	96-00364	NA	07/21/98	NA	04/20/98			
35 MCI Metro Access Transmission Services, Inc.	Merging with WorldCom	Fully Certified as a CTSP	Statewide	Memphis	Full Range of Services	93-08793 96-01006 97-00445	11/22/93	11/20/95	03/26/96	05/15/96	05/21/96 04/07/97	08/25/96 05/06/97	Service offering begins 03/97 in Memphis
36 McMinnville Electric System		Filed as a Fully Certified CTSP	Statewide	Warren County	Full Range of Services	98-00757	10/27/98	Withdrawn					
37 Metropolitan Fiber Systems of Tennessee d/b/a MFSCC	Wholly owned by WorldCom, Inc. Transferred CCN 11	Fully Certified as a CTSP	Statewide	Nashville	Full Range of Services	94-02564	08/31/94	08/24/95	N/A	08/26/96			
38 MFS Intelnet of Tennessee, Inc.	Transfer of Authority from WorldCom	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	97-01207	NA	07/15/97					
39 NA Communications, Inc. (NACI)	Net Access, Inc.	Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	98-00567	08/28/98	Pending					
40 Network Plus, Inc.		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	98-00581	08/19/98	02/09/99					
41 New South Communications		Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services	98-00325 98-00465	05/08/98	06/30/98	09/25/97	04/17/98	07/09/98	08/18/98	

TENNESSEE COMPETING TELECOMMUNICATION SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATION:	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION FILED	APPROVED	INTERCONNECT AGREEMENT			STATUS	
									NEGOTIATION START	COMPLETE	TRA APPROVED FILED	APPROVED	
42	NextLink (Signal Communications of Tennessee LLC)	Fully Certified as a CTSP	Statewide	Nashville Memphis	Full Range of Services	95-02502 96-01018	06/16/95	09/29/95	03/27/96	05/13/96	05/23/96	06/25/96	Facility-based Services offered beginning 6/19/96.
43	Paramount International Telecommunications	Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	96-00623	09/14/98	Withdrawn					
44	Paramount Wireless Communications Company of Tennessee, LLC	Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	96-01354	09/10/96	12/31/96 CCN Denied Date	05/23/96	05/31/97			Hart Interconnect Agreement dismissed 2/4/97
45	P. V. Tel, LLC	Certified as a Reseller Only, Also filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	96-00004 96-00282 96-00802	NA 11/10/98	1/13/1998 Pending	02/05/96	03/16/98	04/20/98	06/02/98	
46	SouthEast Telephone, L.P.	Gen. Partner: CAU Holding	Fully Certified as a CTSP	Counties of: Montgomery Stewart Houston	Full Range of Services	95-03677 96-01125 97-01401	09/20/95	12/22/95	03/06/96	06/26/96	07/03/96 07/21/97	10/01/96 08/19/96	Reseller Only at this time
47	Sprint	Sprint Communication Co. L.P.	Fully Certified as a CTSP	Statewide	Full Range of Services	96-01153 96-01411 97-07547	07/17/96	10/03/96	04/15/96	11/04/97	11/07/97	12/02/97	
48	TCG MidSouth, Inc.	Teleport Communications Group as a CTSP	Fully Certified as a CTSP	Statewide	Full Range of Services	97-00949 96-00642	04/29/97	07/14/97	03/08/96	07/15/96	08/21/96	10/20/96	Plans to begin offering service 4th Qtr. 1997
49	Teligent, Inc.	Fully Certified as a CTSP	Statewide	Memphis, Chattanooga	Full Range of Services	96-00210 96-00619	03/25/98	05/05/98	NA	NA	09/11/98	10/20/98	
50	Time Warner Communications of the Mid-South, LP	Time Warner Fully Certified as a CTSP	Statewide	Memphis	Full Range of Services	93-02860 96-01013	03/19/93	08/24/95	02/08/96	06/02/96	06/07/96	06/25/96	Facility-based Begin offering service 5/97
51	US LEC	US LEC of Tennessee as a CTSP	Statewide	Nashville Memphis	Full Range of Services	97-00387 98-00103	04/03/97	07/15/97	06/12/96	11/08/96	02/18/98	05/05/98	Plans to offer Facility-based service during 1998
52	U.S. West Interprise America, Inc.	U.S. West Fully Certified as a CTSP	Statewide	Statewide	Private Line Frame Relay	97-01383	07/24/97	09/09/97	07/24/97				Plans to use UNE to provide data service. Does not plan to provide local service at this time
53	Williams Communications, Inc. db/a Vyxx, Inc.	Filed as a Fully Certified CTSP	Statewide	Statewide	Full Range of Services	99-00398	06/03/99	Pending					

TENNESSEE COMPETING TELECOMMUNICATION SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATION 3	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION		INTERCONNECT AGREEMENT			STATUS	
							FILED	APPROVED	NEGOTIATION START	COMPLETE	TRA APPROVED FILED		APPROVED
54 WinStar Wireless, Inc.		Fully Certified as a CTSP & CCN	Statewide	Memphis Nashville Statewide	Full Range of Services	95-03232 96-01587 96-00780	08/31/95	12/22/95	03/15/96	08/23/96	11/08/96	02/04/97	
55 WorldCom	Merged with MFS & MCI	Fully Certified as a CTSP	Statewide	Statewide	Full Range of Services		04/17/96	05/30/96	02/08/96				
	TOTAL CERTIFIED AS CTSP	42	4										
	DENIED/CANCELLED CTSP APPLICATIONS	2											
	PENDING	6											
	WITHDRAWN	5											
	INTERCONNECT AGREEMENT APPROVED	24											

TENNESSEE RESELLER SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATIONS	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION FILED	APPROVED	NEGOTIATION START	COMPLETION	TRA APPROVED	APPROVED	STATUS
1 American Network Exchange dba AMNEX		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	95-02728	NA	08/01/95					
2 Ameritech Telecommunications		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-07570	NA	02/03/98	03/06/98	03/19/98	04/20/98	08/02/98	
3 Ameritech Communications International, Inc.	Ameritech, a subsidiary of SBC	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-07510	10/28/97	05/19/98	03/06/98	10/19/98	11/04/98	12/15/98	
4 ANNOX	Bought by Charter Communications	Certified as a Reseller Only	Nashville, Pleasant View	Nashville	Resale of BST Services	96-01314	10/10/96	10/15/96	09/20/96	10/15/96	07/23/97	09/09/97	Begin offering service 01/27/97
5 Atlas		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00244	02/25/97	04/29/97					Filed for Full Certification Approved as Reseller Only at this time
6 Cash To Go, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	NA	NA	NA					
7 Catholic Telecom, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-07578	NA	03/24/98					
8 Cellular Concepts and Paging		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01445	NA	12/02/97	01/28/98	02/25/98	10/28/98	12/01/98	
9 Combined Billing Corporation		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00771	NA	03/24/98					
10 Comm South in TN	Comm South Companies	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01327	07/07/97	08/19/97	06/24/97	07/03/97	08/21/97	10/07/97	
11 Brokerage Services, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01414	NA	10/01/96	10/01/96	10/17/96	04/23/98	06/30/98	
12 Community Telephone Corp. dba Long Distance Management	Formerly Wright Business, Inc.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	95-03300	NA	11/07/95	01/08/97	06/11/97	09/20/98	12/02/97	
13 Connect-A-Phone	John C. Chapman	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00038	NA	02/03/98		NA	04/23/98	06/30/98	
14 Dial & Save of Tennessee	Telco Communications Group, Inc.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-00982	07/25/96	08/13/96					
15 Discount Communications		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	NA	NA	NA	11/03/97	03/13/98			
16 DPL-Teleconnect, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00621	NA	03/02/99			01/21/99	02/16/99	
17 Eagle Communications, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-07487	10/01/97	03/24/98			03/24/99	04/20/99	
18 East Tennessee Phone Service	Tennessee Waile Movers	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00234	NA	07/07/98	NA	NA	08/11/98	09/15/98	

TENNESSEE RESELLER SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATIONS	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION FILED	APPROVED	NEGOTIATION START	COMPLETE	TRA AGREEMENT FILED	APPROVED	STATUS
19 Ernest Telecommunications		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00649	NA	03/16/99					
20 Excel Operations	Tele globe	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-01030	06/10/96	06/25/96	04/14/97				
21 Express Connection Telephone Service		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	NA	NA	NA					
22 EZ Phone, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01230	NA	09/23/97					
23 EZ Talk Communications, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00144	NA	08/26/97	06/18/97	06/26/97	03/02/98	05/02/98	
24 Fast Connections, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00390	NA	10/20/98					
25 Frontier Telemanagement		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-01628	11/21/96	07/29/97	04/21/97	09/19/97	10/06/97	11/04/97	
26 GE Capital Communication Services		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-07450	NA	04/21/98	NA	08/04/97	06/02/98	07/21/98	
27 Golden Financial and Communications Systems, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-01430	NA	10/15/96					
28 Group Long Distance, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00616	NA	11/03/98			12/18/98	02/02/99	
29 Image Access, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00460	NA	10/06/98	03/20/98	05/06/98			
30 Intellicall Operator Services, Inc. (IOS)		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	NA	NA	NA					
31 Interlink Telecommunications		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00916	04/17/97	07/01/97	10/2/96	12/13/96	10/15/97	12/02/97	Application to acquire ownership by Intellicall
32 Ivy Joe Barton		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00316	NA	06/02/98					
33 J3 Communications, Inc.	Frontier Communications International	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-01225	08/01/96	10/29/96					
34 Jerry LaQuiere		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00440	NA	05/20/97	05/06/97	05/06/97			
35 Lawrence Harbro d/b/a Push Button Paging		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00317	NA	08/04/98			04/09/99	05/04/99	
36 LDM Systems	Transferred Ownership to RSL Com U S.A.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00269	02/20/97	04/29/97					Filed for full Certification Approved as Reseller Only at this time

TENNESSEE RESELLER SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATIONS	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION FILED	APPROVED	NEGOTIATION START	COMPLETION	TRA AGREEMENT FILED	APPROVED	STATUS
37 Long Distance Direct Holdings, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00405	NA	08/04/98					
38 Max-Tel Communications, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00235	NA	07/21/98			09/29/98	10/20/98	
39 MoneyPlace, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00646	NA	01/12/99					
40 Net-Tel Corp.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00548	NA	02/16/99			04/22/99	05/18/99	
41 Network Telephone, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00277	NA	02/02/99					
42 North American Telecommunications Corp.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-07498	10/24/97	CCN Cancelled Withdrawn	07/30/97	12/21/97	04/20/98	06/30/98	
43 North American Telephone Network, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00567	NA	02/16/99					
44 NOW Communications, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00911	NA	08/19/97	02/11/98	02/23/98	01/27/97	03/10/98	
45 NuStar Communications Corp.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-07447	09/08/97	01/06/98	08/12/97	09/04/97	01/29/97	03/10/98	
46 Omnicell		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00369	NA	07/21/98	12/23/96	07/07/97	09/22/98	10/20/98	
47 Omniplex Communications Group, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00651	NA	09/15/98					
48 OnePoint Communications, Georgia, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00501	NA	10/20/98					
49 Opus Correctional, Inc		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	NA	NA	NA					
50 Phone-Link, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00274	NA	06/30/98	08/19/97	12/03/97	11/06/98	12/15/98	
51 Preferred Carrier		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00786	05/03/96	06/25/96	05/15/96	05/09/97	05/30/97	09/09/97	
52 Quick-Tel Communications, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01158	NA	07/21/98	01/13/98	02/03/98	11/06/98	12/15/98	
53 Quintaco, Inc.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01304	NA	03/24/98	09/10/97	11/10/97	04/05/99	05/04/99	
54 Resort Hospitality Service Ltd.		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00693	NA	01/19/99					
55 Sotiooco Communications, LLC		Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00846	12/02/98	12/15/98					

TENNESSEE RESELLER SERVICE PROVIDER SUMMARY INFORMATION													
COMPANY	CORPORATE AFFILIATIONS	TYPE OF COMPETITION & CCN	SERVICE AREA	AREA OF FOCUS	SERVICES	DOCKET NO.	CCN APPLICATION FILED	APPLICATION APPROVED	INTERCONNECT AGREEMENT				STATUS
									NEGOTIATION START	COMPLETE	FILED	APPROVED	
66	Shared Communications Services, Inc.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-01160	NA	01/07/97	01/13/98	06/19/98			
67	SouthNet Telecomm Services, Inc.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00534	NA	10/20/98					
68	State Communication	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00330	NA	08/04/98	10/27/97	01/13/98	10/05/98	11/03/98	
69	Sterling International Funding, Inc. d/b/a RECONEX	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01188	06/04/97	07/01/97	10/21/98	02/17/97	07/22/97	09/09/97	
70	TeleComex, Inc.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00353	NA	09/15/98			08/10/99		
71	Telephone Company of Central Florida	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01283	NA	12/07/97					
72	Tel-Save d/b/a The Phone Company	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-01162	NA	06/30/98	NA	05/29/98	03/12/98	04/21/98	
73	Tele-Sys d/b/a Access America	Certified as a Reseller Only	Statewide	East Tennessee	Resale of BST Services	96-00976	05/31/96	08/13/96	10/01/96	11/13/96	03/03/97	04/15/97	
74	TEL-LINK	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-00364	04/23/97	04/29/97	N/A	03/25/97	07/22/97	09/09/97	Begin offering service 3rd Qtr. 1997
75	Tele-Source	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	97-01363	NA	03/10/98	01/12/98	02/02/98	04/20/98	08/02/98	
76	Tennessee Phone Service	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	96-01618	NA	04/29/97	06/24/97	07/08/97	01/15/98	03/24/98	
77	Tennessee Telephone Service	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00639	NA	11/03/98					
78	The Other Phone Company, Inc. d/b/a Access One Communications	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00351	NA	11/03/98					
79	The Video Center, Inc.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	NA	NA	NA	01/16/98	02/02/98	07/20/98	09/18/98	
80	Time Warner Integrated Services Co., d/b/a Warner Connect	Certified as a Reseller Only	Metropolitan Memphis (parts of Shelby, Fayette & Tipton Counties)	Metropolitan Memphis	Resale of BST Services	96-00999	05/14/96	06/25/96	02/10/97	02/10/97	06/09/97	09/09/97	
81	Touch 1 Communications, Inc.	Certified as a Reseller Only	Statewide	Statewide	Resale of BST Services	98-00447	NA	02/02/99	02/10/97	05/12/97	11/18/98	01/19/99	

[illegible]

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
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REQUEST: For **each** location served under **each** CSA, identify for **each** service element provided under the CSA, the alternative provider(s), and the competitive price(s) that BellSouth had to meet in order to retain the customer. (As used here, the competitive price is the price that the same or a substitute service was available from a competitive carrier or the price of the same or a substitute service that BellSouth has reason to believe was available from a competitive carrier.) (Identify the source of the data provided.)

RESPONSE: See BellSouth's response to Item No. 3, CAD's First Interrogatories in Docket 98-00559, September 16, 1998 and BellSouth's response to Item No. 2 above.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
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REQUEST: For **each** CSA, identify the competitive alternative available to the customer, **if at the time the CSA was negotiated**, BellSouth was unaware of a competitive carrier who had or who BellSouth had reason to believe had facilities in place and was capable of providing **each** location served under the CSA with the same service(s) or service(s) that could be substituted for **each** service proved under the CSA.

RESPONSE: Please see BellSouth's response to Item No. 2 above.

BellSouth Telecommunications, Inc.
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REQUEST: For **each** CSA, identify the BellSouth employee who negotiated the CSA and state whether BellSouth first contacted the customer or if the customer first contacted BellSouth requesting the CSA.

RESPONSE: See BellSouth's response to Item No. 5, CAD's First Interrogatories in Docket 98-00559, September 16, 1998.

BellSouth Telecommunications, Inc.
TN Dkts 98-00559, 99-00210 and 99-00244
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REQUEST: Identify by name and title all individual(s) who reviewed and analyzed BellSouth's billing records to determine these Tennessee customers that should be considered as candidates for service under these two CSAs.

RESPONSE: See BellSouth's response to Item No. 14, CAD's First Interrogatories in Docket 98-00559, September 16, 1998.

BellSouth Telecommunications, Inc.
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REQUEST: Please describe the Strategic Partnership Initiative, including a list of any participant/members, etc. in the initiative.

RESPONSE: BellSouth is not clear about the "Strategic Partnership Initiative" to which this request refers.

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REQUEST: Please state whether there is any limit on persons/businesses who can receive discounts.

OBJECTION: BellSouth objects to this request as being vague and overly broad.

Subject to this objection, and without waiving this objection, similarly-situated persons to a CSA customer can avail themselves of the same discounts provided for under the CSA. A person is similarly situated to a CSA customer if that person meets the following three criteria: (1) BellSouth has reason to believe that the price of the service under its existing tariff offering is not competitive for that particular person; (2) the person has a competitive alternative available; and (3) the person is willing to sign a CSA with BellSouth and commit to the terms and conditions contained in the CSA. Discounts are also available out of BellSouth's tariffs.

BellSouth Telecommunications, Inc.
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REQUEST: Please provide copies of all minutes, notes, or other documents from, presented to or by the Chairman's Commitment Council referring to or related to CSAs or similar contractual arrangements or customer retention. (The Chairman's Commitment Council was referred to in Document No. 627: "This compensation procedure seems to be in conflict with BBS' strategic goals of securing and growing revenue. In Dick Anderson's presentation to the Chairman's Commitment Council, securing MSA commitments is the first program listed to address customer retention.").

RESPONSE: BellSouth objects to this Interrogatory on grounds that it is overly broad and unduly burdensome to the extent the request (1) seeks information relating to customer retention generally but not relating to CSAs or similar contractual arrangements; and (2) is not limited in time

Subject to this objection, and without waiving this objection, BellSouth is searching for any documents responsive to this request and will provide any such documents promptly.

REQUEST: On page 9 of the CSA filed as TRA filing #99-00210 the following provision is included:

If _____ is offered a service proposal from an unauthorized carrier that is comparable both in rate and in level of support provided by BellSouth for any V&T Eligible Service which priced at least 15% less than those provided to _____ by BellSouth then these services may be considered for a price reduction. _____ shall provide BellSouth written notice of the service proposal, and sufficient information to validate the terms and rates of the offer and the option to respond to the alternative proposal.

BellSouth shall respond in writing within seven (7) calendar days as to whether or not BellSouth will pursue a new rate for _____. In the event BellSouth elects to respond to the offering from the alternative carrier and offers _____ a service proposal with rates that are within ten percent (10%) of the alternative carrier's competitive offering, this agreement shall continue in effect at the new customized rate and charges until the expiration of the V&T Agreement. The parties shall amend the Minimum Annual Revenue Base and the corresponding Discount Levels listed in Appendix II to reflect the rate reduction and any other portions of the Agreement necessary to effect this Rate Assurance Adjustment.

If BellSouth elects not to respond to the offer from the alternative carrier or does not offer _____ a service proposal with rates that are within ten percent (10%) of the alternative carrier's offering, the parties shall amend Appendix IA, Appendix IB and Appendix II and any other pertinent provisions of this Agreement as necessary to reduce _____'s Minimum Annual Revenue Base, the Annual Revenue Base and the corresponding Discount Levels listed in Appendix II, if necessary, to permit _____ to purchase the services in question from the alternative carrier.

- A. Is this language anti-competitive? If not, please explain why it is not anti-competitive

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RESPONSE: See BellSouth response to Item No. 16b CAD's First Interrogatories in Docket 98-00559, September 16, 1998.

No. Nothing in this section or elsewhere in this CSA prevents the customer from selecting another service provider for any existing or new services at any time. This particular section simply ensures that the customer will benefit from other service proposals, either by electing to accept the other service proposal, or by modifying the existing CSA with BellSouth.

BellSouth Telecommunications, Inc.
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REQUEST: What prohibits BellSouth Telecommunications, Inc. from reducing the rates to all customers in the same class as those serviced under the CSAs to the level charged under the CSAs?

If the reason for not reducing rates to all other customers in the class is the fear of losing a subsidy to universal service, provide the analysis which identifies the amount of subsidy at risk for each service under the applicable CSA.

RESPONSE: See BellSouth's response to Item No. 16(21) CAD's First Interrogatories in Docket 98-00559, September 16, 1998.

BellSouth has not performed an analysis that identifies the amount of subsidy at risk under the applicable CSA.

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REQUEST: For **each** CSA at issue, identify the date that the CSA was signed, and for each location served under the CSA identify the central office through which service is being provided.

RESPONSE: The information responsive to the first part of this Interrogatory is as follows:

Docket No. 99-00210

Agreement	Customer signed April 8, 1998 BellSouth signed April 16, 1998
Amendment	Customer signed April 22, 1999 BellSouth signed April 22, 1999

Docket No. 99-00244

Agreement	Customer signed October 30, 1998 BellSouth signed November 2, 1998
Amendment	Customer signed April 27, 1999 BellSouth signed April 29, 1999

BellSouth objects to this Interrogatory to the extent that it seeks the location of each central office through which service under a CSA is being provided on grounds that the requested information is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence. Furthermore, it would be unduly burdensome, if not impossible, for BellSouth to provide the requested information within a reasonable period of time. BellSouth does not keep records that identify the central offices that provide the specific services to which a particular CSA applies. Thus, to respond to this request, BellSouth would have to identify every billing number associated with each CSA, determine every line or number associated with those billing numbers, and then identify the central office serving each of those numbers. In addition, some services provided under particular CSAs are private line services which are not associated with a particular telephone line. For these services, BellSouth would be required to review each individual private line circuit associated

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RESPONSE(continued):

with each CSA in order to determine the central office or offices out of which each circuit is served. This manual effort would involve thousands of individual lines and circuits served from BellSouth's approximately 200 central offices in Tennessee.

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REQUEST: For **each** CSA at issue, state whether the CSA is specific to the customer's locations in Tennessee or if it also provides for service to the customer's locations in other states.

RESPONSE: Both CSAs are regional agreements.

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REQUEST: If the CSAs at issue are applicable to service provided in both Tennessee and other states, declare if the tariffed rates for the services provided under the CSAs are the same in each state, and declare if the resulting discounted rates for the services provided are the same in each state. Please explain any difference in the tariffed and/or discounted rates.

RESPONSE: BellSouth objects to this Request to the extent that it seeks information concerning CSAs in effect in states other than Tennessee, on the grounds that the Request is overly broad and unduly burdensome. Furthermore, BellSouth objects to any such Request on grounds that the information requested is not relevant to any issue in this proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

Subject to this objection, and without waiving this objection, tariffed rates for services provided pursuant to CSAs do vary from state to state. However, discount percentages for services provided pursuant to these two multistate volume and term CSAs do not vary by state.

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REQUEST: Please provide the computation and the business rationale used in determining the termination liability amounts for the two CSAs.

RESPONSE: The computation of any termination charges would be made in accordance with the terms of Section IX, Termination Liability, of the two CSAs.

Section IX of CSA KY98-4958-00 is set forth in an amendment to the contract, a copy of which is attached.

The termination liability provisions associated with these two CSAs were negotiated with the customers. The termination liability is intended to provide a financial incentive for the customer to honor the term of the agreement in return for BellSouth's commitment to provide a level of discounts over the same term and to provide BellSouth with the benefit of this commitment in the event the customer fails to honor its agreement.

REQUEST: For each CSA, provide the percent discount from BellSouth's tariffed rates that a CLEC would have to offer the customer to offset the termination liability specified in the CSA.

Assume:

- A. Terminated in Year 1.
- B. Terminated in Year 2.
- C. Terminated in Year 3.

OBJECTION: BellSouth objects to this request on the grounds that the calculation the CAD is requesting BellSouth to make "may be derived or ascertained" by the CAD from a CLEC's publicly-filed tariffs and BellSouth CSAs TN98-2766-00 and KY98-4958-00. The termination liability provisions are set forth in Section IX of those CSAs. The burden, therefore, of deriving or ascertaining this information is substantially the same for the CAD as it is for BellSouth. See T.C.R.P. 33.03 and 26.02.

Subject to this objection and without waiving this objection, BellSouth notes that these CSAs may be resold at a discount by CLECs. Further, BellSouth cannot speculate as to CLEC pricing strategies.

CERTIFICATE OF SERVICE

I hereby certify that on July 16, 1999, a copy of the foregoing document was served on the parties of record, via the method indicated:

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Richard Collier, Esquire
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0500

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Henry Walker, Esquire
Boult, Cummings, et al.
414 Union Ave., #1600
P. O. Box 198062
Nashville, TN 39219-8062

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Jon Hastings, Esquire
Boult, Cummings, et al.
414 Union St., #1600
Nashville, TN 37219

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Charles B. Welch, Esquire
Farris, Mathews, et al.
511 Union St., #2400
Nashville, TN 37219

- ☐ Hand
- ☒ Mail
- ☐ Facsimile
- ☐ Overnight

James Lamoureux, Esquire
AT&T
1200 Peachtree St., NE
Atlanta, GA 30309

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Vance Broemel, Esquire
Consumer Advocate Division
426 5th Avenue, N., 2nd Floor
Nashville, TN 37243

- ☒ Hand
- ☐ Mail
- ☐ Facsimile
- ☐ Overnight

Val Sanford, Esquire
Gullett, Sanford, et al.
230 4th Ave., N., 3rd Fl.
P. O. Box 198888
Nashville, TN 37219-8888



A handwritten signature in black ink, consisting of a large, stylized 'S' shape followed by a horizontal line and a small flourish.